



## WESTON FOREST GROUP

### 2025 Annual Report: Forced Labour and Child Labour in Supply Chains

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#### Reporting Entity under Section 11(1) of the Act:

Weston Forest Products Inc. (collectively, “Weston Forest Group”, “Weston Forest” or “the Company”)

**Fiscal Reporting Year:** January 1 – December 31, 2024

**Date of Report:** May 27, 2025

All information provided in this Report pertains to Weston Forest Products Inc. as the entity required to report pursuant to Section 11(1) of the Act on behalf of its Canadian subsidiaries: Weston Forest Products Inc., Bramwood Forest Inc., Monterra Lumber Mills Ltd. and Kings Wood Products Inc., collectively referred to herein as “Weston Forest Group” or “the Company”). All information presented in this Report is current as of the date set forth above unless otherwise indicated.

#### **INTRODUCTION**

Weston Forest Products Inc. and its entities (“Weston Forest Group” or “the Company”) is committed to conducting business with integrity and ensuring our operations and supply chains are free from forced labour and child labour. This report outlines the steps taken in 2024 to identify and mitigate the risks of such practices, pursuant to Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211).

#### ENTITY OVERVIEW AND ORGANIZATIONAL CHANGES

##### **This report pertains to Weston Forest Products Inc., reporting on behalf of its Canadian subsidiaries:**

- Weston Forest Products Inc. (Ontario, Canada)
- Monterra Lumber Mills Ltd. (Ontario, Canada)
- Kings Wood Products Inc. (Ontario, Canada)

##### **Operational Changes Since Last Report:**

- Bramwood Forest Inc.:  
As of the end of 2024, Bramwood’s operations were fully amalgamated under Weston Forest Products Inc. Bramwood Forest no longer functions as a separate legal or reporting entity.

##### **Non-Reporting U.S. Entities (Not Applicable)**

- Industrial Lumber Sales (ILS) in Moultrie, Georgia
- Northern Industrial Wood (NIW) in Lincoln, Michigan

*The above U.S.-based subsidiaries are not subject to the reporting requirements under this legislation.*

#### **COMPANY ACTIVITIES AND SUPPLY CHAIN OVERVIEW**

Weston Forest Group is a leading North American distributor and manufacturer of industrial wood products. Weston Forest specializes in the distribution, manufacturing, and remanufacturing of softwood and hardwood lumber products including industrial packaging, panel processing, production of specialty wood products, commercial construction, and infrastructure projects.



#### **Supply Chain Summary:**

- Over 99% of raw materials and products are sourced from North American suppliers, with the majority being medium-to-large sized Canadian or US-based companies with largely unionized labour forces.
- South American imports are minimal and represent a fraction of a percent of our imported product, with sourcing restricted to large, unionized, certified partners.
- Our Asian import volumes are negligible.
- More than 50% of our supply base are FSC and SFI certified suppliers and we maintain strong relationships with large, unionized companies that share our values around social responsibility.

#### **Supply Chain Oversight and Ethical Sourcing:**

Our procurement policies prioritize working with suppliers who share our values of transparency, legality, and ethical responsibility. We seek partnerships with suppliers who demonstrate compliance with recognized third-party certifications—such as FSC® (Forest Stewardship Council) and SFI® (Sustainable Forestry Initiative)—which include strict prohibitions against the use of forced or child labour and provide audit-based verification of ethical sourcing.

We also require compliance with our Supplier Code of Conduct, which includes clauses related to labour rights, safe working conditions, and compliance with applicable labour laws. This Code is reviewed during supplier onboarding and periodically thereafter as needed.

#### **Certification and Regulatory Alignment:**

Participation in **C-TPAT** (Customs-Trade Partnership Against Terrorism) reinforces our supply chain security practices, including verification and screening of partners for ethical risks. Our early adoption of **CFIA** programs such as the **CHTWPCP** and **CWPCP** reflects our commitment to transparent product traceability, regulatory compliance, and international standards.

In addition, Weston Forest's **FSC® Chain of Custody certification** (FSC® C109634) provides clear documentation of product sourcing and movement through the supply chain, supporting our ability to identify and manage potential risks related to labour conditions at each stage.

### **POLICIES AND DUE DILIGENCE**

#### **Policies:**

- Fighting Forced and Child Labour Policy (mandatory annual review and training)
- Supplier Code of Conduct (explicit expectations around labour practices)

#### **Training:**

- Annual training is mandatory for all supply-chain-related staff.
- Training covers red flags, reporting mechanisms, and proactive identification techniques.
- We have trained our HR team and hiring managers to use a standard screening questionnaire during candidate phone screens and interviews. This includes verifying eligibility to work in Canada, possession of a valid social insurance number and driver's license (if applicable).

#### **Recruitment:**

- Weston Forest is committed to upholding ethical labour standards and preventing the use of forced or child labour within our operations. We have implemented robust recruitment and employment screening procedures as part of our due diligence framework.

- All prospective employees are required to complete a pre-employment questionnaire, and our Human Resources team conducts comprehensive resume screening to assess qualifications, experience, and consistency.
- As part of the verification process, we confirm each candidate's eligibility to work in Canada, including validation of a valid Social Insurance Number (SIN). Where role-appropriate, a valid driver's license is also required and verified.
- Age verification is conducted when necessary to ensure all employees meet the minimum legal working age requirements.
- These measures form a critical part of Weston Forest's approach to responsible recruitment and help reduce the risk of inadvertently engaging in or facilitating exploitative labour practices.

**Background Checks:**

- As part of Weston Forest's commitment to ethical business practices and responsible employment, all prospective employees are subject to pre-employment background screening. The purpose of these checks is to verify the accuracy of information provided by candidates and to identify any potential risks that may be inconsistent with Weston Forest's values and compliance obligations.
- Employment offers are conditional upon satisfactory background check results, which are conducted through an independent third-party provider and funded by the Company. If any results are deemed to be unsatisfactory, the offer may be rescinded or employment terminated.
- This background screening process supports our broader due diligence efforts to uphold ethical labour standards and mitigate risks associated with forced or child labour within our operations and supply chains.

**RISK ASSESSMENT**

In 2024, Weston Forest conducted internal reviews of its supply chain and concluded the following:

- Over 99% of our supply base originates from North America.
- The greatest (though still minimal) risk lies in imported materials from South America. That said, our imports from South America account for a fraction of a percent of our imported materials.
- No significant procurement from high-risk regions (e.g., Asia, Sub-Saharan Africa). Asian import volumes are negligible.
- No instances of forced or child labour were identified in 2024.

To the best of our knowledge, no instances of forced or child labour have been identified within our operations or supply chain. We are committed to continuous monitoring and assessment of our operations and supply chain to prevent the incorporation of unethical practices in the future.

**PREVENTATIVE & REMEDIATION MEASURES TAKEN**

- No remedial actions or income restoration measures were required.
- In 2024, we updated our Supplier Code of Conduct to mandate supplier due diligence as condition of doing business with us.
- Verification of employment eligibility for all prospective candidates and new hires.
- Ensured the continued availability of grievance procedures for use by internal staff and external supplier workers.

**CONTINUOUS IMPROVEMENT**

As a Company, we are committed to refining our due diligence framework and stakeholder engagement on an ongoing basis. We evaluate our effectiveness through:

- Annual policy reviews.



- Reviewing and updating our supplier expectations and contractual language as required.
- Engaging with suppliers and peer organizations to benchmark and share best practices.
- Reviewing risk-based auditing protocols to ensure effectiveness.

## **COLLABORATIVE EFFORTS**

Weston Forest collaborates with a variety of regulatory and industry bodies that help shape standards, best practices, and regulations within the forest products and lumber distribution sector. Examples of organizations that Weston Forest collaborates with include:

- **Industry associations** (e.g., Canadian Wood Council [CWC], North American Wholesale Lumber Association [NAWLA])
- **Certification bodies** (e.g., Forest Stewardship Council [FSC], Sustainable Forestry Initiative [SFI], Canadian Food Inspection Agency [CFIA])
- **Relevant government and NGO bodies** as appropriate to ensure regulatory alignment and social responsibility

Weston Forest engages with these key organizations to uphold high standards in sustainability, regulatory compliance, and ethical business practices. According to our official channels, Weston Forest is actively involved in multiple associations—often serving at the committee, board, or executive level—to contribute to the development of responsible industry frameworks. Our third-party certifications and formal participation in supply chain integrity programs reflect our proactive approach to environmental stewardship and trade compliance.

These collaborative efforts directly support Weston Forest’s commitment to **complying with Bill S-211**, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This federal legislation mandates that companies take meaningful steps to assess, prevent, and report on risks of forced and child labour across their supply chains.

Our engagement with the **FSC**—which prohibits forced and child labour as part of its core principles—provides third-party verification that our sourcing practices align with international human rights standards.

Similarly, our involvement in the **C-TPAT** program reflects a robust, risk-based approach to international trade security and ethical supplier vetting. Through collaboration with regulatory bodies such as the **CFIA**, we maintain rigorous traceability and compliance frameworks that contribute to broader supply chain transparency.

Participation in industry associations like **NAWLA** and **CWC** further reinforces our ability to stay informed and responsive to emerging compliance expectations, including those introduced by Bill S-211. These relationships foster a shared commitment across the industry to uphold ethical labour practices, enhance due diligence mechanisms, and promote transparency and accountability throughout the supply chain.

## **CONCLUSION**

Weston Forest recognizes that ensuring ethical labour practices and transparency in global supply chains is an evolving responsibility. By continuously strengthening our due diligence processes and working collaboratively with suppliers, certifying bodies, and industry peers, Weston Forest is committed to maintaining a transparent, responsible, and legally compliant supply chain.

As we continue to align our operations with the requirements of Bill S-211, we will make ongoing efforts to identify key initiatives to further enhance our due diligence programs and reinforce our commitment to combating forced and child labour in supply chains.



## **ATTESTATION**

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chief Human Resources Officer of Weston Forest Group attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

**"I, Jasmine Antonio, hereby attest that I have the authority to bind Weston Forest Products Inc."**

A handwritten signature in black ink, appearing to read "Antonio", written over a horizontal line.

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**Jasmine Antonio**  
Chief Human Resources Officer  
Weston Forest Products Inc.

May 27, 2025

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**Date Signed**